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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

REBECCA MARTIN, an Individual;

Plaintiff,

v.

TARGET CORPORATION, a Foreign Corporation;
YET UNKNOWN EMPLOYEE; DOES I through
X, inclusive,

Defendants.

CASE NO.: 2:17-cv-02329-APG-NJK

**STIPULATED REQUEST FOR
EXTENSION OF DISCOVERY
DEADLINES (Third Request)**

The above named parties, by and through their respective counsel of record, hereby submit the following STIPULATED REQUEST FOR EXTENSION OF DISCOVERY DEADLINES (Third Request).

A. DISCOVERY COMPLETED TO DATE

This matter involves a slip and fall at one of defendant's stores. On October 10, 2017, the parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and documents on October 12, 2017. Plaintiff served her initial disclosure of witnesses and documents on October 10, 2017. On October 17, 2017, the Court entered a Stipulated Discovery Plan/Scheduling Order. On December 20, 2017, the Court entered an order granting the parties' first request to extend the discovery deadlines. On March 5, 2018, the Court entered an order granting the parties' second request to extend the discovery deadlines.

On October 17, 2017, defendant propounded a First Set of Interrogatories and First Set of Requests for Production of Documents upon plaintiff. Plaintiff served her responses to the Interrogatories on November 20, 2017 and responses to the Requests for Production of Documents on November 28, 2017. On October 30, 2017, plaintiff propounded a First Set of Requests for Production of Documents upon defendant. On November 22, 2017, plaintiff propounded a Second

1 Set of Requests for Production of Documents upon defendant. Defendant served its responses to the
2 First Set of Requests for Production of Documents on January 19, 2018 and served its responses to
3 the Second Set of Requests for Production of Documents on January 26, 2018.

4 Plaintiff conducted the deposition of one of defendant's former employees on March 12,
5 2018. Plaintiff was unable to serve another one of defendant's former employee with a subpoena
6 and vacated that deposition. Plaintiff conducted the deposition of a 30(b)(6) representative of
7 defendant regarding four issues on March 26, 2018. Plaintiff conducted the deposition of one of
8 defendant's current employees on May 17, 2018. Plaintiff scheduled the deposition of a 30(b)(6)
9 representative of defendant regarding two additional issues for June 11, 2018. Plaintiff agreed to
10 reschedule that deposition as Defendant is in the process of substituting counsel.

11 The parties served initial expert witness disclosures on May 4, 2018. Defendant served a
12 supplemental expert witness disclosure on June 5, 2018.

13 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

14 Defendant needs to conduct the deposition of plaintiff and up to four of plaintiff's healthcare
15 providers. Plaintiff has scheduled the deposition of defendant's 30(b)(6) representative regarding
16 two additional topics. Plaintiff may also conduct the depositions of additional employees and
17 representatives. The parties also anticipate conducting the depositions of designated expert
18 witnesses.

19 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

20 Defendant is in the process of substituting counsel in this matter. That substitution of
21 counsel has delayed the scheduling and completion of the remaining depositions as new counsel
22 becomes familiar with this matter and the parties schedule the depositions based upon new counsel's
23 availability.

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1 Accordingly, the parties request a thirty day extension of the current discovery deadlines.

2 **D. PROPOSED DISCOVERY SCHEDULE**

3	Close of Discovery:	August 2, 2018
4	Dispositive Motions:	September 4, 2018
5	Joint Pre-Trial Order:	October 4, 2018
6	Last day to amend pleadings:	Closed
7	Initial Expert Disclosures:	Closed
8	Rebuttal Expert Disclosures:	Closed
9	Interim Status Report	Closed

10 DATED this 12th day of June, 2018.

DATED this 12th day of June, 2018.

11 **WILSON, ELSER, MOSKOWITZ,**
12 **EDELMAN & DICKER LLP**

THE GALLIHER LAW FIRM

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19 IT IS SO ORDERED.

**NO FURTHER EXTENSIONS
WILL BE GRANTED.**

20 Dated June 13, 2018

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22 **UNITED STATES MAGISTRATE JUDGE**